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September 24, 2014

VIA ECF AND HAND DELIVERY

The Honorable Denise L. Cote
United States District Court for the Southern District of New York
500 Pearl Street
Room 1610
New York, NY 10007

Re: In re Application of The Coalition To Protect Clifton Bay and Louis Bacon for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings, No. 14-Misc-258

Dear Judge Cote:

We represent Petitioners The Coalition To Protect Clifton Bay ("Save The Bays") and Louis Bacon ("Mr. Bacon") (together, "Petitioners") in connection with the above-referenced action seeking discovery from Stephen Feralio ("Mr. Feralio"), pursuant to 28 U.S.C. § 1782 (the "Section 1782 Action").

We write pursuant to Rule 4(A) of Your Honor's Individual Practices in Civil Cases to request permission to submit in redacted form certain statements appearing at page 3 of Petitioners' Opposition to the Nygård Parties' Motion to Intervene in the above-referenced action as well Exhibits D and E to the Supplemental Declaration of Stephen J. Feralio. These statements and Exhibits have been redacted consistent with the redactions that the parties agreed to make to prior filings and reflected in Your Honor's order of September 17, 2014 (Dkt. 37). We respectfully request permission to file these documents in redacted form with the unredacted pages filed under seal.

Sincerely,

/s/ Orin Snyder

Orin Snyder

cc: All counsel of record